

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,
BELFRY HOLDINGS, INC., MARY BLY,
COLUMBUS ROSE, LTD., MICHAEL
CONNELLY, SYLVIA
DAY, ELOISA JAMES, INC., JONATHAN
FRANZEN, JOHN
GRISHAM, HIERONYMUS, INC., ELIN
HILDERBRAND,
CHRISTINA BAKER KLINE, S.C.R.I.B.E.,
INC., SPLENDIDE MENDAX, INC, SYLVIA
DAY LLC, VICTOR LAVALLE,
GEORGE R.R. MARTIN, JODI PICOULT,
DOUGLAS PRESTON, ROXANA ROBINSON,
GEORGE SAUNDERS, SCOTT TUROW, and
RACHEL VAIL, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI
GP LLC, OPENAI, LLC, OPENAI GLOBAL
LLC, OAI CORPORATION LLC, OPENAI
HOLDINGS LLC, OPENAI STARTUP FUND I
LP, OPENAI STARTUP FUND GP I LLC,
OPENAI STARTUP FUND MANAGEMENT
LLC, and MICROSOFT CORPORATION,

Defendants.

JONATHAN ALTER, KAI BIRD, TAYLOR
BRANCH, RICH COHEN, EUGENE LINDEN,
DANIEL OKRENT, JULIAN SANCTON,
HAMPTON SIDES, STACY SCHIFF, JAMES
SHAPIRO, JIA TOLENTINO, TOUGH JEWS,
INC., and SIMON
WINCHESTER, on behalf of themselves and all
others similarly situated,

Plaintiffs,

ECF CASE

No. 1:23-cv-08292-SHS;
No. 1:23-cv-10211-SHS

JURY TRIAL DEMANDED

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI GP LLC, OPENAI, LLC, OPENAI GLOBAL LLC, OAI CORPORATION LLC, OPENAI HOLDINGS LLC, OPENAI STARTUP FUND I LP, OPENAI STARTUP FUND GP I LLC, OPENAI STARTUP FUND MANAGEMENT LLC, and MICROSOFT CORPORATION,

Defendants.

AUTHOR PLAINTIFFS' MOTION TO SEAL

Under paragraph 25 of the Stipulated Protective Order in this case (Dkt. 338), Author Plaintiffs respectfully seek to provisionally file under seal portions of their letter motion to compel and exhibits B-I in support. The letter motion seeks a conference to discuss a discovery dispute—specifically, Author Plaintiffs seek an Order compelling OpenAI to produce the documents they have already produced to the News Plaintiffs from the custodial files of Michael Lampe, Brad Lightcap, and Wojciech Zaremba. The Author Plaintiffs seek to file portions of this letter motion under seal because exhibits B-I to the motion include and discuss documents that Defendants have designated as Protected Discovery Material under the Protective Order. Dkt. 338 ¶ 25. The Author Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. *Id.* The Author Plaintiffs will review Defendants' filings, and if necessary, confer about any disagreement.

Dated: March 31, 2025

/s/ Rachel Geman

Rachel Geman
Anna J. Freymann
Wesley Dozier (*pro hac vice*)
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Tel.: 212.355.9500
rgeman@lchb.com
afreymann@lchb.com
wdozier@lchb.com

Reilly T. Stoler (*pro hac vice*)
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111
Tel.: 415.956.1000
rstoler@lchb.com

/s/ Scott J. Shoulder

Scott J. Shoulder
CeCe M. Cole
COWAN DEBAETS ABRAHAMS &
SHEPPARD LLP
60 Broad Street, 30th Floor
New York, NY 10010
Tel.: 212.974.7474
sshoulder@cdas.com
ccole@cdas.com

/s/ Rohit D. Nath

Justin A. Nelson (*pro hac vice*)
Alejandra C. Salinas (*pro hac vice*)
Amber Magee (*pro hac vice*)
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, TX 77002
Tel.: 713.651.9366
jnelson@susmangodfrey.com
asalinas@susmangodfrey.com
amagee@susmangodfrey.com

Rohit D. Nath (*pro hac vice*)
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Tel.: 310.789.3100
rnath@susmangodfrey.com

J. Craig Smyser
Charlotte Lepic
SUSMAN GODFREY L.L.P.
One Manhattan West, 51st Floor
New York, NY 10001
Tel.: 212.336.8330
csmyser@susmangodfrey.com
clepic@susmangodfrey.com

Jordan W. Connors (*pro hac vice*)
SUSMAN GODFREY L.L.P.
401 Union Street, Suite 3000
Seattle, WA 98101
Tel.: 206.516.3880
jconnors@susmangodfrey.com

Interim Class Counsel

CERTIFICATE OF SERVICE

I hereby certify this 31st day of March, 2025, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Rohit D. Nath

(Signature)